

Optional Cover Letter

Braven Environmental, LLC is submitting this Bona Fide Notice of Intent to Manufacture for the following UVCB chemical substances:

1. Waste plastics, pyrolyzed, C5-12 fraction (CAS No. 2055370-07-3) - PMN No. P-14-713
2. Waste plastics, pyrolyzed, C9-20 fraction (CAS No. 2055370-08-4) - PMN No. P-14-714
3. Waste plastics, pyrolyzed, C20-55 fraction (CAS No. 2055370-09-5) - PMN No. P-14-715

These three chemical substances are included on the TSCA inventory and are also covered by the PMNs noted above, as well as a direct final Significant New Use Rule (SNUR) included in the Federal Register on November 17, 2016.

Braven Environmental is submitting this Bona Fide Notice of Intent to Manufacture to determine all current, approved uses of the three substances, and whether or not any of the proposed uses covered in this notice would be considered a significant new use for any of these substances.

Please let us know if there are any questions or if additional information is needed to process this request. Thank you for your time and assistance.

BONA FIDE INTENT TO MANUFACTURE OR IMPORT NOTICE		Total Number of Pages not including attachments. 9
GENERAL INSTRUCTIONS		
<ul style="list-style-type: none"> You must provide all information requested in this form to the extent that it is known to or reasonably ascertainable by you. Make reasonable estimates if you do not have actual data. Before you complete this form, you should read the '40 CFR 720.25.' The accuracy of the statements you make in this notice should reflect your best prediction of the anticipated facts regarding the chemical substance described herein. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 USC 1001. 		
GENERAL INFORMATION You must provide the currently correct Chemical Abstracts (CA) Name of the chemical substance, even if you claim the identity as confidential. You may authorize another person to submit chemical identity information for you, but your submission will not be complete and the review will not begin until EPA receives this information. SITE INFORMATION You will be able to identify your site of manufacture and/or port of entry on the 'Submitter Site Identification' screen through the Facility Registry System. This information will display on the 'Site Information' page within this Portable Document Format (PDF). Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence.		LIST OF ATTACHMENTS The attached documents will display on the 'List of Attachments' page within the PDF. The attachment will display with the document name, document type, description and section title. CONFIDENTIALITY CLAIMS You may claim the entirety of the form as Confidential Business Information (CBI) by checking the CBI checkbox located on the 'General Document Information' screen. The 'CBI' checkbox below will be marked (X) if you checked the CBI checkbox on the 'General Document Information' screen within the application.
I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate. I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has: <ul style="list-style-type: none"> (i) taken reasonable measures to protect the confidentiality of the information; (ii) determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law; (iii) a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and (iv) a reasonable basis to believe that the information is not readily discoverable through reverse engineering. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.		
CBI	<input type="checkbox"/>	

GENERAL INFORMATION								
SUBMITTER IDENTIFICATION								
Primary Contact Information								
Name	(prefix)	Mr	(first)	Jeffrey	(middle initial)	(last)	Neumann	(suffix)
Job Title	Chief Administrative Officer							
Company Name	Braven Environmental, LLC							
Email Address	jneumann@bravenenvironmental.com			Phone Number	9176589330			
Mailing Address 1	430 Nepperhan Avenue							
Mailing Address 2								
City	Yonkers	State	NY	Postal Code	10701			
Country	US							
Technical Contact Information								
Name	(prefix)	Mr.	(first)	Jesse	(middle initial)	(last)	Goellner	(suffix)
Title	Chief Technology Officer							
Company Name	Braven Environmental, LLC							
Email Address	jgoellner@bravenenvironmental.com			Phone Number	4125135833			
Mailing Address 1	214 East Seventh Avenue Suite C							
Mailing Address 2								
City	Homestead	State	PA	Postal Code	15120			
Country	US							
Letter of Support Submitter Information (if Applicable)								
This box will be marked (X) if you are submitting this notice as part of a letter of support submission. <input type="checkbox"/>								
Name	(prefix)		(first)		(middle initial)	(last)		(suffix)
Title								
Company Name								
Email Address				Phone Number				
Mailing Address 1								
Mailing Address 2								
City		State		Postal Code				
Country								

GENERAL INFORMATION -- Continued					
SUBMITTER IDENTIFICATION -- Continued					
Submitting Official Information					
Name of Authorized Official	(prefix)	(first)	Jeffrey	(middle initial)	(last) Neumann (suffix)
Job Title	Not Applicable				
Company Name	Braven Environmental, LLC				
Email Address	jneumann@bravenenvironmental.com		Phone Number	9176589330	
Mailing Address 1	430 Nepperhan Avenue				
Mailing Address 2					
City	Yonkers	State	NY	Postal Code	10701
Country	US				
Submitting on Behalf of Company (If Applicable)					
Name of Authorized Official	(prefix)	(first)	(middle initial)	(last)	(suffix)
Job Title					
Company Name					
Email Address			Phone Number		
Mailing Address 1					
Mailing Address 2					
City		State		Postal Code	
Country					
STATEMENT OF INTENT:					
<p>The 'Manufacture' and/or 'Import' checkboxes will be marked as (X) based on the selection made on the 'Statement of Intent' screen.</p> <p>Manufacture (Site of Manufacture) <input checked="" type="checkbox"/> Import (Port of Entry) <input type="checkbox"/></p>					
Date of expected Section 5 notification if the result is that the chemical is not on the inventory			2nd Quarter 2021		

GENERAL INFORMATION -- Continued		
CHEMICAL IDENTIFICATION INFORMATION:		
Chemical Name: Waste plastics, pyrolyzed, C5-12 fraction		
Generic Chemical Name:		
'Chemical Abstract Service' (CAS) Registry Number	2055370-07-3	
Method 1 (CASs Inventory Expert Service - a copy of the Identification report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)	<input type="checkbox"/>	Method 2 (Other Method) <input checked="" type="checkbox"/>
Molecular Formula (Optional)		
CHEMICAL IDENTIFICATION INFORMATION:		
Chemical Name: Waste plastics, pyrolyzed, C9-20 fraction		
Generic Chemical Name:		
'Chemical Abstract Service' (CAS) Registry Number	2055370-08-4	
Method 1 (CASs Inventory Expert Service - a copy of the Identification report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)	<input type="checkbox"/>	Method 2 (Other Method) <input checked="" type="checkbox"/>
Molecular Formula (Optional)		
CHEMICAL IDENTIFICATION INFORMATION:		
Chemical Name: Waste plastics, pyrolyzed, C20-55 fraction		
Generic Chemical Name:		
'Chemical Abstract Service' (CAS) Registry Number	2055370-09-5	
Method 1 (CASs Inventory Expert Service - a copy of the Identification report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)	<input type="checkbox"/>	Method 2 (Other Method) <input checked="" type="checkbox"/>
Molecular Formula (Optional)		

Class 2 substance
Immediate precursor substance names with their respective CAS Registry Numbers. Waste Plastics
Nature of the reaction or process. An endothermic cracking complex reaction process from the pyrolysis of waste plastics at 300 degrees C to 650 degrees C. Waste plastics are pyrolyzed and then the distillation column boiling range is used to identify what "cut" it is, such as C5-12, C9-20, or C20=55. Copies of the Safety Data Sheets for each chemical substance are attached.
Range of composition (optional) Unknown or variable composition, complex reaction products 1. For Waste plastics, pyrolyzed, C5-12 fraction: Range of composition consists of hydrocarbons having carbon numbers predominantly in the range of C5 through C12, heteroaromatics, and other organic components. 2. For Waste plastics, pyrolyzed, C9-20 fraction: Range of composition consists of hydrocarbons having carbon numbers predominantly in the range of C9 through C20, heteroaromatics, and other organic components 3. For Waste plastics, pyrolyzed, C20-55 fraction: Range of composition consists of hydrocarbons having carbon numbers predominantly in the range of C20 through C55, heteroaromatics, and other organic components

GENERAL INFORMATION -- Continued**USE INFORMATION:**

Major intended uses of all three chemical substances will be as petrochemical/refinery feedstocks, chemical feedstocks, and/or fuel blendstocks.

SITE IDENTIFICATION**SUBMITTER SITE IDENTIFICATION****Site 1****EPA Registry ID****110070864905****Site of Manufacture or Port of Entry****Site of Manufacture****Site Name****BRAVEN ENVIRONMENTAL, LLC****Address (number and street)****517 INDUSTRIAL DRIVE****City****ZEBULON****State****NC****Postal Code****27597****Site 2****EPA Registry ID****Site of Manufacture or Port of Entry****Site Name****Address (number and street)****City****State****Postal Code****Site 3****EPA Registry ID****Site of Manufacture or Port of Entry****Site Name****Address (number and street)****City****State****Postal Code**

Attachments List				
#	File Name	Document Type	Description	Section Title
1	Braven Environmental - C5-C12 C9-C20 and C20-C55 UVCB Chemical Substances - Spectrum of Substance Statement - February 2021.pdf	Spectrum of Substance	Spectrum of Substance Statement	BonaFide Document Management
2	Braven Environmental - C5-12 C9-20 and C20-55 UVCB Chemical Substances - Statement of Commercialization - February 2021.pdf	Statement of Commercialization	Statement of Commercialization	BonaFide Document Management
3	RD_Activity_Braven Environmental_February 2021_C5-C12.pdf	Statement of Research and Development	R&D Statement for C5-12 Chemical Substance	BonaFide Document Management
4	RD_Activity_Braven Environmental_February 2021_C9-C20.pdf	Statement of Research and Development	R&D Statement for C9-20 Chemical Substance	BonaFide Document Management
5	RD_Activity_Braven Environmental_February 2021_C20-C55.pdf	Statement of Research and Development	R&D Statement for C20-55 Chemical Substance	BonaFide Document Management
6	Waste_plastics_pyrolyzed_C512_fraction_SDS_US_102120_FINAL_V1p1.pdf	Other	SDS for Waste plastics, pyrolyzed, C5-12 fraction	Bonafide Class 2 Substance
7	Waste_plastics_pyrolyzed_C920_fraction_SDS_US_102120_FINAL_V1p1.pdf	Other	SDS for Waste plastics, pyrolyzed, C9-20 fraction	Bonafide Class 2 Substance
8	Waste_plastics_pyrolyzed_C2055_fraction_SDS_US_102120_FINAL_V1p1.pdf	Other	SDS for Waste plastics, pyrolyzed, C20-55 fraction	Bonafide Class 2 Substance